

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

JEFFREY CARLOS HALE, on behalf of)
himself and all others similarly situated,)

Plaintiffs,)

v.)

CNX GAS COMPANY LLC, et al.,)

Defendants.)

Case No. 1:10-cv-59

DORIS BETTY ADDISON, on behalf of)
herself and all others similarly situated,)

Plaintiffs,)

v.)

CNX GAS COMPANY LLC, et al.,)

Defendants.)

Case No. 1:10-cv-65

CNX GAS COMPANY LLC'S MOTION FOR PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c)(1)(A), defendant CNX Gas Company LLC (hereinafter "CNX"), by its undersigned counsel, respectfully moves this Court for the entry of an Order protecting CNX against any additional discovery, for the reasons stated in the accompanying memorandum. The undersigned certifies that CNX's counsel has in good faith conferred with counsel for Plaintiffs in an attempt to resolve this dispute without Court action.

Dated: November 11, 2014

Respectfully submitted,

CNX GAS COMPANY LLC

By Counsel

/s/ Jonathan T. Blank

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CERTIFICATE OF SERVICE

I hereby certify that on November 11, 2014 a true and correct copy of the foregoing instrument was sent to all counsel of record registered to receive filings via ECF.

/s/ Jonathan T. Blank

Jonathan T. Blank (VSB No. 38487)

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CERTIFICATE OF CONFERENCE

Pursuant to Fed. R. Civ. P. 26(c)(1), the undersigned, Jonathan T. Blank, hereby certifies that counsel for Defendants has in good faith attempted to confer with counsel for Plaintiff in an effort to resolve this discovery dispute. Counsel are at an impasse.

/s/ Jonathan T. Blank